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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/17/2023

March 16, 2023

Honorable Analisa Torres
United States District Judge
500 Pearl Street
New York, NY 10007

Re: Hernandez, et al. Amsterdam Ave. Realty Corp, et al.
22-cv-3094 (AT)

Your Honor,

Plaintiff writes to respectfully request that discovery remain open for the limited purpose of Plaintiff's request for Defendants' tax records, and/or compelling Defendants' to produce the same.

Plaintiff requested in his document demands copies of corporate and individual tax returns however Defendants have yet to produce them.

The undersigned has spoken with defense counsel several times to obey the good faith requirement and the Defendants have agreed in good faith to produce tax returns with some redactions. However, the Defendants themselves have yet to remit those documents to their attorney despite discovery ending shortly.

Plaintiff makes this request to preserve his right to compel compliance prior to the ending of fact discovery on March 17th, 2023.

GRANTED. Fact discovery will close on **March 31, 2023** for the limited purpose described above. The case management conference scheduled for April 5, 2023, is ADJOURNED to **April 25, 2023**, at **11:40 a.m.** Additionally, the parties are reminded that they must file a joint status report not later than one week in advance of the case management conference. ECF No. 44. And, pre-motion letters for any motions for summary judgment must be submitted within fourteen days of the close of fact discovery.

SO ORDERED.

Dated: March 17, 2023
New York, New York



ANALISA TORRES
United States District Judge